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*Attorneys for Defendant/Counterclaim-Plaintiff
NATERA, INC.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ILLUMINA, INC.,

Plaintiff/Counterclaim-
Defendant,

v.

NATERA, INC.,

Defendant/Counterclaim-
Plaintiff.

CASE NO. 3:18-cv-01662-SI

**DEFENDANT/COUNTERCLAIM-
PLAINTIFF NATERA, INC.'S
CORRECTED ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF EXHIBIT B TO THE
PARTIES' JOINT STIPULATION
PREVIOUSLY FILED AS DKT NO. 141**

Hearing Date: N/A
Time: N/A
Place: Courtroom 1, 17th Floor
Judge: Hon. Susan Y. Illston

1 Defendant/Counterclaim-Plaintiff Natera, Inc. (“Natera”) submits this corrected administrative
2 motion for a sealing order pursuant to Civil Local Rule 79-5, previously filed as Dkt. No. 141. Natera
3 respectfully requests that the Court permit portions of Exhibit B of the parties’ Joint Stipulation (Natera,
4 Inc.’s Second Amended Invalidity Contentions Under Patent L.R. 3.3 and Exhibit 15 in support of
5 same (“Confidential Documents”) be filed under seal.

6 This motion is based on the points and authorities herein, and on the accompanying Declaration
7 of Christine Ranney in Support of Defendant/Counterclaim-Plaintiff Natera’s Administrative Motion
8 to File Under Seal (“Ranney Decl.”) and the Declaration of David King filed as Dkt. No. 106 (“King
9 Decl.”).

10 Portions of Natera, Inc.’s Second Amended Invalidity Contentions Under Patent L.R. 3.3 refer
11 to and quote material that third party Fluidigm Corporation (“Fluidigm”) has designated as
12 “Confidential” and “Outside Attorneys’ Eyes Only” pursuant to the Protective Order, Dkt. No. 59.
13 Specifically, portions of Natera’s Second Amended Invalidity Contentions refer to and quote to
14 material that is Fluidigm’s confidential and proprietary information regarding its products that are
15 otherwise not believed to be publicly available. Natera will inform Fluidigm that it intends to file its
16 Second Amended Invalidity Contentions Under Patent L.R. 3-3 and the Administrative Motion to file
17 Fluidigm’s materials under seal, and Natera expects Fluidigm will file a new declaration or refer the
18 Court to the King Decl. establishing that its materials should remain sealed.

19 Portions of Exhibit 15 in support of Natera, Inc.’s Second Amended Invalidity Contentions
20 Under Patent L.R. 3.3 refer to and quote material that third party Fluidigm Corporation (“Fluidigm”) has
21 designated as “Confidential” and “Outside Attorneys’ Eyes Only” pursuant to the Protective Order,
22 Dkt. No. 59. Specifically, portions of Exhibit 15 refer to and quote to material that is Fluidigm’s
23 confidential and proprietary information regarding its products that are otherwise not believed to be
24 publicly available. Natera will inform Fluidigm that it intends to file Exhibit 15 in support of Natera,
25 Inc.’s Second Amended Invalidity Contentions Under Patent L.R. 3-3 and the Administrative Motion
26 to file Fluidigm’s materials under seal, and Natera expects Fluidigm will file a new declaration or will
27 refer the Court to the King Decl. establishing that its materials should remain sealed.

1 Accordingly, Natera respectfully requests that portions of the Confidential Documents
2 contained in Exhibit B of the parties' Joint Stipulation be filed under seal.

3
4 Date: August 19, 2019

Respectfully submitted,

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6 By: /s/ Tracey B. Davies

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